

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE

JESUS JIMENEZ HUERTAS

DEBTOR(S)

CASE NO. 13-04969-ESL

CHAPTER: 13

MOTION REQUESTING ADEQUATE PROTECTION
(Pre-Confirmation Periodic cash Payments)

TO THE HONORABLE COURT:

Comes now, RELIABLE FINANCIAL SERVICES, INC., holder of a secured claim and Movant herein, through the undersigned attorney and very respectfully Alleges and Prays:

1. That the above captioned debtor(s) filed a voluntary Chapter 13 bankruptcy Petition pursuant the provisions of 11 U.S.C. on **JUNE 16, 2013**.

2. Movant is the holder in due course of a duly executed conditional sales contract over motor vehicle SUZUK XL7 2006 registered under number 4027249, executed by debtor(s) on OCTOBER 18, 2011.

3. That at time of the filing of the above captioned bankruptcy petition debtor(s) was (were) in arrears with the payments called for under executed conditional sales contract.

4. As per 11 U.S.C §1326 (a)(1)(C) Movant moves the Court to enter an order granting adequate protection by way of pre-confirmation periodic cash payments as hereinafter proffered:

a. Pre-confirmation cash payments equivalent to **\$150.00** monthly of the amount paid by debtor(s) to the Chapter 13 Trustee pursuant to the terms of the proposed Chapter 13 Plan, and

b. Said payments be paid retroactively to the date of the first payments due under the plan.

5. The appearing secured creditor does not waive its right to request any other legal remedy that it may deem proper pursuant to the circumstances of the case.

WHEREFORE, Movant respectfully prays this Court to enter an Order granting the foregoing motion if a timely answer has not been filed within **TWENTY (20)** days and thus, ordering debtor(s) and the Chapter 13 Trustee to provide adequate protection to security interest way of **pre-confirmation periodic cash payments** as hereinafter proffered as mentioned in averment number 4.

CERTIFICATE OF SERVICE

I hereby certify that the present motion was filed electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the **ALEJANDRO OLIVERAS**, Trustee and **JUAN O. CALDERON LITHGOW**, Debtor(s) Attorney and that we have sent copy of this document through regular mail to Debtor(s) **JESUS JIMENEZ HUERTAS,, PARC MARQUEZ 8 CALLE HIGUERA MANATI, PR 00674** and all non CM/ECF participants interested parties to their address of record.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico this 17 day JULY, 2013.

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